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**JUN 13 1997**

June 13, 1997

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**BY HAND DELIVERY**

William F. Caton  
Acting Secretary  
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Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

**DOCKET FILE COPY ORIGINAL**

Re: Advanced Television Systems  
MM Docket No. 87-268

Dear Mr. Caton:

Transmitted herewith on behalf of Qwest Broadcasting L.L.C., licensee of television station WATL, Atlanta, Georgia, are an original and eleven copies of its Petition for Partial Reconsideration of the Sixth Report and Order in the above-referenced proceeding.

Respectfully submitted,

*Barbara K. Gardner*

Barbara K. Gardner

Enclosures

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BEFORE THE

# Federal Communications Commission

WASHINGTON, D.C. 20554

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In the Matter of

Advanced Television Systems  
and Their Impact Upon the  
Existing Television Broadcast  
Service

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Federal Communications Commission  
Office of Secretary

MM Docket No. 87-268

## **PETITION FOR PARTIAL RECONSIDERATION OF THE SIXTH REPORT AND ORDER**

Qwest Broadcasting L.L.C. ("Qwest"), licensee of television station WATL, NTSC Channel 36, Atlanta, Georgia, hereby seeks partial reconsideration of the Sixth Report and Order, FCC 97-115 released April 21, 1997, in the captioned proceeding ("Sixth R&O").

Because implementation of the DTV Table of Allotments as adopted in the Sixth R&O will result in greater levels of interference than the FCC predicts, both to WATL's NTSC facility and to its DTV station, the Table should be reassessed.

According to the FCC's calculations, Station WATL's existing NTSC service on Channel 36 reaches 3,076,000 persons in an area of 18,960 square kilometers, of which .7 percent of the persons and 5.3 percent of the area will experience new interference from DTV operations.<sup>1</sup> WATL's DTV service on Channel 25 is predicted to serve 3,109,000 persons in an area of 19,731 square kilometers.<sup>2</sup>

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<sup>1</sup> Sixth R&O at B-15.

<sup>2</sup> Id.

Qwest's preliminary calculations, however, indicate far greater interference to both its NTSC and its DTV operations than these numbers suggest. For example, WATL's NTSC Channel 36 apparently will receive interference from DTV Channel 36 in Wrens, Georgia (assigned to Station WCES-TV) such that some 159,000 persons will not receive an acceptable WATL NTSC signal. WCES-TV is located only 200 kilometers from WATL, less than the 244.6 kilometer UHF DTV-to-NTSC separation requirement adopted in the Sixth R&O for Zones II and III.<sup>3</sup>

In other cases, distant sources of interference appear to have been overlooked in the Commission's assessment of new interference to WATL's NTSC service. For example, DTV operation on Channel 36 by WTVY-TV, Dothan, Alabama, will cause almost 23,000 viewers to receive unacceptable interference to reception of WATL's NTSC operations on that channel. In total, as a result of these and other stations' DTV operations, Qwest's preliminary calculations suggest a decline in the number of persons who receive WATL's existing NTSC service of far greater magnitude than the .7 percent calculated by the FCC.

A similar underestimate of the degree of interference to WATL's future DTV operations appears to be reflected in the Sixth R&O, largely due to overlooked interference from a distant co-channel DTV station. Station WUNF-TV, Asheville, North Carolina, will interfere with reception of WATL's DTV Channel 25 signal by almost 169,000 persons.

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<sup>3</sup> Id. at 98-99 para. 215, E-36-E-37 (47 C.F.R. § 73.623(d)). Although the Commission intends that these standards apply to new (not initial) DTV allotments, and acknowledges that the initial DTV Table of Allotments contains a number of nonconforming allotments, its coverage calculations should certainly take interference resulting from such short-spacings into account.

These calculations are preliminary due to the FCC's failure to release OET Bulletin No. 69. Nevertheless, Qwest agrees with the Association for Maximum Service Television, Inc. that the Sixth R&O's Appendix B (the DTV Table of Allotments) overlooks, or insufficiently accounts for, significant sources of interference to both NTSC and DTV service, particularly interference attributable to distant stations.<sup>4</sup> Correcting the DTV Table's coverage calculations could, because of the daisy-chain effect, affect the current DTV assignments for numerous stations, not only WATL. The Commission should promptly undertake such corrections.

The Commission should recalculate the interference and resulting NTSC and DTV coverage areas for WATL and other stations as soon as possible, and make appropriate changes to the DTV Table of Allotments.

Respectfully submitted,

QWEST BROADCASTING L.L.C.

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June 13, 1997

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<sup>4</sup> Petition for Clarification and Partial Reconsideration of the Fifth and Sixth Reports and Orders of the Association for Maximum Service Television, Inc., The Broadcasters Caucus and Other Broadcasters, June 13, 1997.